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IN THE THIRD JUDICIAL DISTRICT COURT OF SALT LAKE COUNTY
STATE OF UTAH

JONATHAN D. SANDERS,

Plaintiff,

vs.

PROGRESSIVE PREFERRED INSURANCE
COMPANY,

Defendant.

**NOTICE OF REMOVAL FROM UTAH STATE
COURT**

Civil No. 210900866
Federal Court Case No.:

Judge:

Defendant Progressive Preferred Insurance Company ("Progressive"), through counsel, hereby submits this Notice of Removal of the above-entitled action from the Third Judicial District Court, Salt Lake County, State of Utah, to the United States District Court for the District of Utah. By this petition, Progressive gives notice of the removal of the action. This notice of, and petition for, removal is made pursuant to 28 U.S.C. section 1441 et seq. and is proper and appropriate based upon the following:

1. On or about February 16, 2021, Progressive, through C.T. Corporation System, was served with a Summons and Complaint in an action captioned Jonathan D. Sanders v. Progressive Preferred Insurance Company, Civil No. 210900866. A copy of the Return of Service, Summons and Complaint are attached hereto as Exhibit A.
2. The Complaint alleges that Plaintiff is a resident of the state of Utah. Progressive Preferred Insurance Company, is a provider of auto insurance doing business in Salt Lake County, Utah.
3. Removal of this action is proper under 28 U.S.C. section 1441(b) because there is complete diversity: plaintiff is a citizen of Utah while Progressive's sole member is not a citizen of Utah. Progressive Preferred Insurance Company is a subsidiary of The Progressive Corporation, with its principal place of business in the State of Ohio. Also, Plaintiff has asserted claims for damages in excess of \$300,000, exclusive of interest and costs.
4. This Notice of Removal has been filed within thirty (30) days after service of the Summons and Complaint as required by 28 U.S.C. section 1446(b).

DATED this 9th day of March 2021.

J. JOYCE LAW FIRM

By /s/ Joseph J. Joyce
Joseph J. Joyce
Attorneys for Defendant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 9th day of March 2021, a true and correct copy of the foregoing NOTICE OF REMOVAL FROM STATE COURT was filed and served via electronic notification upon the following:

Jeffrey J. Steele
Steele, Adams, Hosman
765 E. 9000 S., Ste. A-1
Sandy, UT 84094

/s/ Mindie Michelson